

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SRI INTERNATIONAL, INC.,
a California Corporation,

Plaintiff and
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware Corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
Corporation, and SYMANTEC
CORPORATION, a Delaware Corporation,

Defendants and
Counterclaim-Plaintiffs.

SECOND DECLARATION OF DON HALL

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Inc., a Georgia Corporation*

Dated: July 10, 2006

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C. A. No.: 04-1199 (SLR)

SECOND DECLARATION OF DON HALL

1. My name is Don Hall and I have previously submitted a declaration in connection with this litigation. The facts set forth herein are based upon my own experience, personal knowledge, and belief, and are true.

2. As I set forth in my original declaration, RealSecure NT 1.0 provided an Activity Tree Window feature, which integrated and correlated the events or reports from the RealSecure Engines based on various criteria, including the network source address that initiated the security event or incident ("Source"), the network destination address affected by the security event or incident ("Destination") and the type of security attack that was detected ("Event"). This was done automatically without user intervention.

3. As part of this functionality, RealSecure Console would create and maintain data structures to track the grouped events. When a new event came into the Console, a data entry

(node for the tree) was created. When another event subsequently was sent to the Console by a RealSecure agent that was to be combined as part of the group, the node for the tree was updated to indicate the addition to the group. This data structure allowed new events to be added to the group of combined events. The data structure was also used to display the grouping correctly in the Activity Tree Window.

4. I reserve the right to supplement my declaration and to rely on additional information that comes to my attention between now and the end of trial. I declare under penalty of perjury that the foregoing is true and correct.

Dated: _____

7/7/06

Don Hall

Don J. Hall

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on July 10, 2006, the foregoing document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on July 10, 2006, I have Electronically Mailed the attached document to the following non-registered participants:

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